

June 20, 2016

VIA ELECTRONIC MAIL

Jim Brownell
Central Valley Water Quality Control Board
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Michael Mosley
U.S. Bureau of Reclamation
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Re: Reclamation Draft Annual Work Plan, FY 2017

Dear Jim and Michael:

Stockton East Water District (Stockton East) has reviewed the U.S. Bureau of Reclamation (Reclamation) Draft Annual Work Plan (Work Plan) for the Fiscal Year 2017 and has several comments, concerns and questions.

First, while the Work Plan pays lip service to reducing the reliance on New Melones for dilution flows, it is unclear what actions Reclamation is taking to actually ensure this happens. We note there is no mention of acquisition of water from other sources to provide dilution. Clearly, this would have the direct effect of reducing dilution flows from New Melones. We suggest water acquisitions be included in the Work Plan as was originally contemplated in the Federal legislation (Public Law 108-361) establishing the Program to Meet Standards. The reference to New Melones Plan of Operation as a salinity management activity undertaken by Reclamation seems misplaced. Development of an operations plan is not a salinity management activity.

We support enhancing the reporting of data throughout the Real Time Management Program (RTMP) network. As we have discussed many times during the Lower San Joaquin Committee meetings, the Patterson, Maze and Crows Landing stations all should be added to the list for improvement as we have seen inconsistent reporting from these stations. We believe that meeting with districts discharging into the San Joaquin River regarding the forecasting model should be expedited as this coordination will be essential to make the RTMP work.

Reclamation should work with the wildlife refuges to develop Best Management Practices to reduce the water quality impacts of the discharges from wildlife refuges

June 20, 2016

Page 2 of 2

that receive water from Reclamation that discharge salt into the San Joaquin River which is required by Public Law 108-361. This should be included in the Work Plan.

Finally, we believe the Regional Board should require Reclamation to specifically quantify the salt reduction results of each task undertaken pursuant to the Work Plan and have those results documented in the Annual Report to the Regional Board required by the Management Agency Agreement.

We look forward to working with Reclamation in implementing a successful RTMP that will have a meaningful benefit to water quality in the San Joaquin River and reducing the use of dilution flows from New Melones.

Very truly yours,

A handwritten signature in black ink, appearing to read 'K E Harrigfeld', with a stylized flourish at the end.

KARNA E. HARRIGFELD
Attorney-at-Law

cc: Scot A. Moody